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Attorneys for Plaintiff  
TERRY SHIBAO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

TERRY SHIBAO,

Plaintiff,

v.

ALEXANDRA PLUTA,

Defendant.

CIVIL NO. 13-00090 KSC

PLAINTIFF'S MOTION TO  
COMPEL DISCOVERY AND FOR  
EXPENSES/SANCTIONS;  
MEMORANDUM IN SUPPORT OF  
MOTION; DECLARATION OF  
DARIUSH KEYHANI;  
CERTIFICATION; DECLARATION  
OF FRANCES STEPHENSON;  
DECLARATION OF MILTON M.  
YASUNAGA; EXHIBITS A-Y;  
CERTIFICATE OF SERVICE

Trial: October 7, 2014

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY AND FOR  
EXPENSES/SANCTIONS**

Plaintiff TERRY SHIBAO ("Plaintiff") moves for an order compelling Defendant ALEXANDRA PLUTA ("Defendant") to provide the discovery and for expenses/sanctions.

This motion is based on Fed. R. Civ. Pro. Rules 7, 26, 33, 34, and 37, and the attached memorandum, declaration, and exhibits.

DATED: Honolulu, Hawaii, January 31, 2014.

CADES SCHUTTE LLP

/s/ Milton M. Yasunaga  
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TERRY SHIBAO